

## **ANDERSON EXHIBIT 22**

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1                               UNITED STATES DISTRICT COURT  
2                               FOR THE DISTRICT OF MASSACHUSETTS  
3   - - - - -  
4   IN RE:   PHARMACEUTICAL               )   MDL NO. 1456  
5   INDUSTRY AVERAGE WHOLESAL       )   CIVIL ACTION  
6   PRICE LITIGATION                    )   01-CV-12257-PBS  
7   THIS DOCUMENT RELATES TO         )  
8   U.S. ex rel. Ven-a-Care of         )   Judge Patti B. Saris  
9   the Florida Keys, Inc.               )  
10         v.                                 )   Chief Magistrate  
11   Abbott Laboratories, Inc.,         )   Judge Marianne B.  
12   No. 06-CV-11337-PBS                 )   Bowler  
13   - - - - -  
14                       (captions continue on following pages)  
15  
16  
17       Videotaped deposition of JOHN M. LOCKWOOD, M.D.  
18                               Volume II  
19  
20                               Washington, D.C.  
21                               Thursday, January 17, 2008  
22                               9:00 a.m.

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1           A.    I did not bring them with me, no, sir.  
2    I did not bring them with me.

3           Q.    Did you confirm that every invoice for  
4    an Abbott product has been produced in this  
5    litigation?

6           MR. BREEN:  Objection, form.

7           A.    Well, I think several months ago we  
8    made a search at Ven-A-Care for invoices again.  
9    I don't know what searches we made before.  And I  
10   think, unless they have some privilege attached  
11   to them, that the things we found were produced  
12   to you.  We may have lost some invoices and some  
13   patient record stuff during Hurricane George in  
14   1999 when our office was flooded and part of the  
15   ceiling caved in.  So I don't know if I can  
16   represent to you that every invoice that Ven-A-  
17   Care ever had for an Abbott product was produced  
18   to you, but what we have was as far as I know.  
19   Yes, sir.

20          Q.    Are you able to point me to the control  
21   numbers for the invoices that were produced?

22          A.    I may be able to do that after lunch.